



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

June 23, 2005

Certified Mail No. 7000 1670 0013 8128 3029

Mike Schutz
Plant Manager
Hilex Poly Co. LLC
40 West 100 South
Jerome, ID 83338

RE: Facility ID No. 053-00011, Hilex Poly Co. LLC, Jerome
Final Permit to Construct Letter

Dear Mr. Schutz:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050411 for the Hilex Poly facility, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on April 14, 2005. This permit is effective immediately and replaces your previous permit number P-040408, issued on January 28, 2005. This permit does not release Hilex Poly Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Since this project does not significantly change the terms of your permit, DEQ will not contact you regarding a meeting to discuss the terms of the permit. However, if you wish to meet to discuss the permit terms and requirements, you may contact Steve VanZandt of the Twin Falls Regional Office to schedule a meeting. If a meeting is scheduled, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/BR/CZ/sd
Enclosures

Permit No. P- 050411



**Air Quality
PERMIT TO CONSTRUCT**
State of Idaho
Department of Environmental Quality

PERMIT No.: P-050411

FACILITY ID No.: 053-00011

AQCR: 63

CLASS: B

SIC: 3081

ZONE: 11

UTM COORDINATE (km): 702.4, 4731.7

1. **PERMITTEE**
Hilex Poly Company LLC

2. **PROJECT**
Plastic bag manufacturing facility

3. **MAILING ADDRESS**
40 West 100 South

CITY
Jerome

STATE
ID

ZIP
83338

4. **FACILITY CONTACT**
Mike Schutz

TITLE
Plant Manager

TELEPHONE
(208) 404-4920

5. **RESPONSIBLE OFFICIAL**
Mike Schutz

TITLE
Plant Manager

TELEPHONE
(208) 404-4920

6. **EXACT PLANT LOCATION**
40 West 100 South, Jerome

COUNTY
Jerome

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
Manufacture of plastic grocery bags

8. **GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.


TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: June 23, 2005

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....	3
1. PERMIT TO CONSTRUCT SCOPE	4
2. CORONA TREATERS	5
3. PERMIT TO CONSTRUCT GENERAL PROVISIONS.....	8

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
PTC	permit to construct
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050411

Permittee:	Hilex Poly Company LLC	Facility ID No. 053-00011	Date Issued:	June 23, 2005
Location:	Jerome, Idaho			

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

- 1.1 This permit to construct revises PTC No. P-040408 to allow the early installation of Phases 2 and 3 for the plastic bag manufacturing facility located in Jerome.
- 1.2 This PTC replaces PTC No. P-040408, issued on January 28, 2005, the terms and conditions of which no longer apply.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	<u>Corona treaters (13)</u> Manufacturer: Enercon Model number: CS012SF-200/2 or equivalent Feed material: High density polyethylene Maximum rated input capacity: Varies Power source: Varies	None

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050411

Permittee:	Hilex Poly Company LLC	Facility ID No. 053-00011	Date Issued:	June 23, 2005
Location:	Jerome, Idaho			

2. CORONA TREATERS

2.1 Process Description

Hilex Poly Company LLC manufactures plastic grocery bags. Polyethylene pellets are transferred from storage bins to extruders via a vacuum handling system. The extruders forms the pellets into a tubular film which is then cooled and passed through a corona treater. A high voltage corona discharge ionizes the film surface to prepare it for printing. The film is wound into rolls and stored until needed for conversion into bags.

Emissions Limits

2.2 Emissions Limits for All Corona Treaters Combined

- Ozone emissions from all corona treaters combined shall not exceed 5.1 lb/hr.
- Ozone emissions from all corona treaters combined shall not exceed 22.4 tons per any consecutive 12-month period.

2.3 Ozone Emission Factor

The permittee shall use the equipment-specific emissions factor, 0.073 pounds ozone per hour per kilowatt (lb O₃/hr/kW), to estimate ozone emissions.

Operating Requirements

2.4 Power Source Limit

The power supplied to all corona treaters combined shall not exceed 70 kilowatts.

2.5 Ozone Treater Changes or Modifications

If the permittee changes or modifies any ozone treater in any way, the permittee shall obtain as soon as practicable a written assurance from the ozone treater manufacturer that the change or modification has not changed the ozone generation characteristics.

If the manufacturer cannot or does not provide written assurance that the ozone generation characteristics have not changed as a result of any change or modification, the emission factor specified in Permit Condition 2.3 shall be deemed invalid and the permittee shall conduct a performance test in accordance with IDAPA 58.01.01.157 as soon as practicable to measure ozone emissions to demonstrate compliance with Permit Condition 2.2.

2.6 Ozone Monitoring Plan

The permittee shall operate an ozone and meteorological site in accordance with a DEQ-approved ozone and meteorological plan commencing no later than May 1, 2005.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050411

Permittee:	Hilex Poly Company LLC	Facility ID No. 053-00011	Date Issued:	June 23, 2005
Location:	Jerome, Idaho			

2.7 Meteorological Station

The permittee shall operate and maintain a 10-meter meteorological installation in accordance to the guidelines contained in "Ambient Monitoring Guidelines for Prevention of Significant Deterioration (PSD)"; U.S. Environmental Protection Agency, 1987. Office of Air Quality Planning and Standards (OAQPS). EPA - 450/4-87-007.

Parameters monitored shall include wind speed, wind direction, temperature, delta-temperature (2m & 10m), relative humidity, solar radiation and barometric pressure.

2.8 Ozone Monitoring Installation

The permittee shall use the results of air dispersion modeling and DEQ input to locate and install an ambient ozone monitor considering the following: regulatory requirements for monitoring location, location of maximum modeled ozone impact, locations frequented by the public, and logistical issues (including but not limited to power availability and maintenance).

2.9 Ozone Monitoring Operation, Manufacturing Phase 1

The permittee shall install and operate an ozone monitoring site according to the approved plan no later than 60 days after DEQ approval of the monitoring plan. A minimum of one full season (May 1 – September 30) of ozone measurements shall be collected during the manufacturing Phase 1 operations. The manufacturing Phase 2 and manufacturing Phase 3 equipment may be constructed and operated prior to completion of the first full season of ozone measurements for phase 1 operations.

2.10 Ozone Monitoring Operation, Manufacturing Phase 2

After completeness of manufacturing Phase 2 installation and the start of operations, a second full season (May 1 – September 30) of measurements shall be collected for a total of two full seasons of measurements collected.

2.11 Ozone Monitoring Operation, Manufacturing Phase 3

After completeness of manufacturing Phase 3 installation and the start of operations, a third full season (May 1 – September 30) of measurements shall be collected for a total of three full seasons of measurements collected.

2.12 Ozone Control Device and Testing

- 2.12.1 Ozone and meteorological data collected will be analyzed by DEQ to develop an appropriate background ozone concentration for the site. The background concentration will be the highest monitored value, not considering monitored values that may be impacted by Hilex Poly's ozone emissions. Values considered as an anomaly by DEQ will also be excluded from consideration as a background value.
- 2.12.2 Ozone and meteorological data collected will also be used by DEQ to calibrate the dispersion modeling analyses. Based on the results of the calibration, an adjustment factor will be developed to apply to modeled concentrations.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050411

Permittee:	Hilex Poly Company LLC	Facility ID No. 053-00011	Date Issued:	June 23, 2005
Location:	Jerome, Idaho			

- 2.12.3 Compliance with the ozone 8-hour standard will then be assessed through a modeling analysis using: 1) on-site meteorological data; 2) the revised ozone background concentration; 3) an adjustment factor applied to modeled results accounting for inaccuracies of the model for the Hilex Poly facility.
- 2.12.4 If compliance with the ozone 8-hour standard is not demonstrated to the satisfaction of DEQ, the permittee shall install and operate equipment to control ozone emissions sufficient to reduce ozone emissions to levels which, through air dispersion modeling, demonstrate to the satisfaction of DEQ that the ozone 8-hour standard is not exceeded.

Monitoring and Recordkeeping Requirements

2.13 Power Source Monitoring

The permittee shall monitor and record the power supplied to each corona treater and calculate the total power supplied to all the corona treaters once per day when operating to demonstrate compliance with Permit Condition 2.4. Power shall be expressed as kilowatts (kW). A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

2.14 Ozone Monitoring Review

At the completion of the monitoring from each manufacturing phase of operations, DEQ and Hilex Poly will review the monitoring data and assess any issues. DEQ's approval, based on the monitoring data, is required prior to operation of the next manufacturing phase.

Reporting Requirements

2.15 Reporting

The permittee shall compile the results of the ozone and meteorological station monitoring and submit the results to DEQ no later than 30 days (October 30) after the end of each monitoring season. The ozone and meteorological monitoring plan and the ozone and meteorological monitoring results shall be submitted to the following addresses:

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office
601 Pole Line Rd.
Twin Falls, ID 83301
Phone: (208) 736-2190
Fax: (208) 736-2194

Bruce Louks
MMEI Manager
Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706
Phone: (208) 373-0502
Fax: (208) 373-0154

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050411

Permittee:	Hilex Poly Company LLC	Facility ID No. 053-00011	Date Issued:	June 23, 2005
Location:	Jerome, Idaho			

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050411

Permittee:	Hilex Poly Company LLC	Facility ID No. 053-00011	Date Issued:	June 23, 2005
Location:	Jerome, Idaho			

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.